



*The County of San Diego*

# Zoning Administrator Hearing Report

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<b>Date:</b>	June 25, 2020	<b>Case/File No.:</b>	North County Environmental Resources; PDS2008-3500-08-015, PDS2013-BC-13-0019, PDS2008-3910-0808012
<b>Place:</b>	No in Person Attendance Allowed – Teleconference Only – County Conference Center 5520 Overland Avenue San Diego, CA 92123	<b>Project:</b>	Consideration of the environmental findings to determine whether the proposed recycling facility can be exempt from further environmental review pursuant to CEQA Guidelines § 15183
<b>Time:</b>	8:30 a.m.	<b>Location:</b>	25568 Mesa Rock Road
<b>Agenda Item:</b>	#3	<b>General Plan:</b>	High Impact Industrial (I-3)/Semi-Rural Residential (SR-4)
<b>Appeal Status:</b>	Appealable to the Planning Commission	<b>Zoning:</b>	General Impact Industrial (M54)/ Rural Residential (RR)/ Limited Agriculture (A-70)
<b>Applicant/Owner:</b>	Hilltop Group, Inc.	<b>Community:</b>	North County Metropolitan Subregional Plan Area (Twin Oaks Community)
<b>Environmental:</b>	CEQA § 15183 Exemption	<b>APNs:</b>	187-100-23, 187-100-31, 187-100-33, 187-100-35, 187-100-37, and 187-100-38

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## **A. OVERVIEW**

The purpose of this staff report is to provide the Zoning Administrator with the information necessary to make a finding that the mitigation measures identified in the General Plan Update Environmental Impact Report (GPU EIR) will be adequate for a proposed Site Plan (STP) and Boundary Adjustment pursuant to California Environmental Quality Act (CEQA) Guidelines §15183(e)(2)

CEQA Guidelines §15183 mandates a streamlined environmental review process for projects that are consistent with the densities established by existing zoning, community plan, or general plan policies for which an EIR was certified.

CEQA Guidelines §15183(c) further specifies that if an impact is not peculiar (i.e., significant) to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

CEQA Guidelines §15183(e)(2) requires the lead agency to make a finding at a public hearing when significant impacts are identified that could be mitigated by undertaking mitigation measures previously identified in the EIR on the planning and zoning action.

In accordance with CEQA Guidelines §15183, the Project was evaluated to examine whether additional environmental review might be necessary for the reasons stated in §15183. As discussed in the attached Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist (15183 Findings) dated June 25, 2020, the project qualifies for an exemption from further environmental review.

The Applicant, Hilltop Group, Inc., is requesting approval of a STP and Boundary Adjustment to construct and operate a recycling facility (Project) on a 139-acre site. The STP is required because the site has a "B" Special Area Designator. A Boundary Adjustment is required because the Applicant is proposing to adjust lot lines between parcels 187-100-35 and 187-100-37 to provide additional buffer to residential properties located to the south of the Project.

As part of the discretionary permit processing, the County is required to evaluate the impacts a Project would have on the environment. Projects that are consistent with the analysis performed for the GPU EIR and do not introduce significant effects that were not identified in the GPU EIR (i.e., peculiar), are subject to a streamlined environmental review process pursuant to CEQA Guidelines §15183. The purpose of today's hearing is not to approve or deny the project, but to evaluate whether the Project can be streamlined pursuant to CEQA Guidelines §15183.

The approval, approval with modifications, or denial of the proposed STP and Boundary Adjustment will be a subsequent and separate decision made by the Director of Planning & Development Services (PDS). The decision of the Director of PDS is limited to the STP and Boundary Adjustment.

Staff has received significant interest from community members expressing concern and opposition to the Project. During public notification, which occurred from September 12, 2019 to October 14, 2019, over 500 people commented expressing their opposition to the Project. Specifically, concerns were related to air quality, odors, noise, aesthetics, fire, and traffic. In addition, community members have requested that an Environmental Impact Report (EIR) be prepared for the project in order to evaluate environmental impacts.

**B. PROJECT LOCATION**

The Project site is located west of Interstate 15 (I-15), directly south of Mesa Rock Road, within the Twin Oaks Community Sponsor Group Area of the North County Metropolitan Subregional Plan Area (Figure 1). The Project site encompasses six contiguous parcels including Assessor Parcel Numbers (APNs) 187-100-23, -31, -33, -35, -37, and -38. The proposed recycling facilities and operations would be conducted on APN 187-100-37, which is approximately 0.25 miles south of Mesa Rock Road.

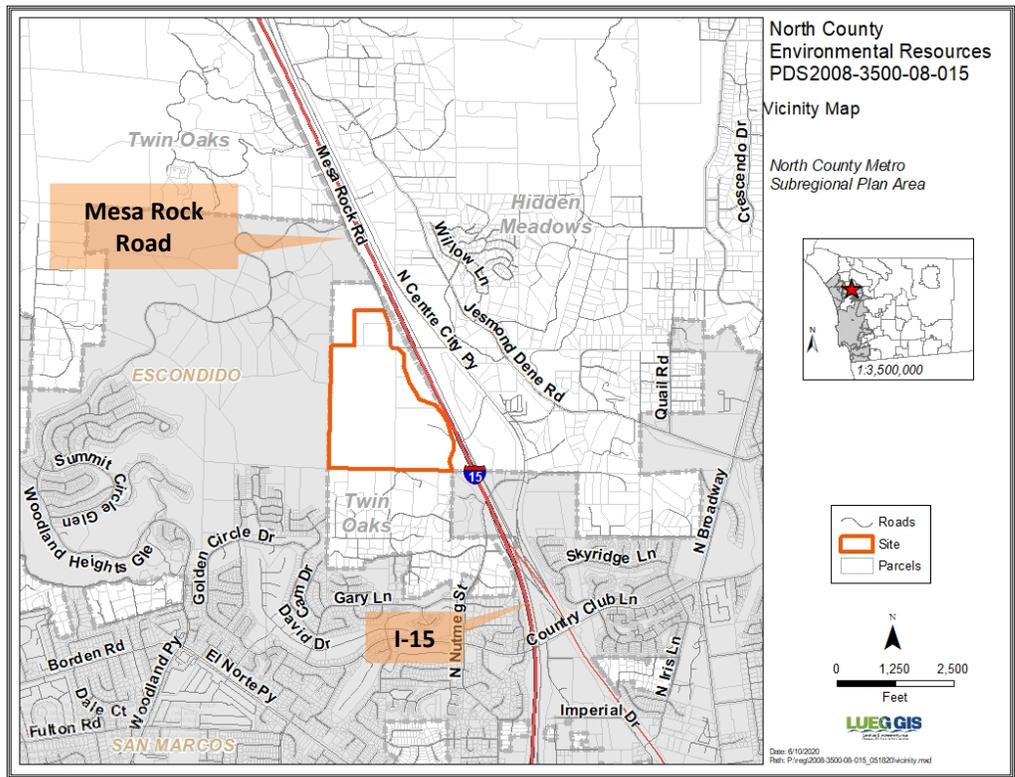


Figure 1: Vicinity Map

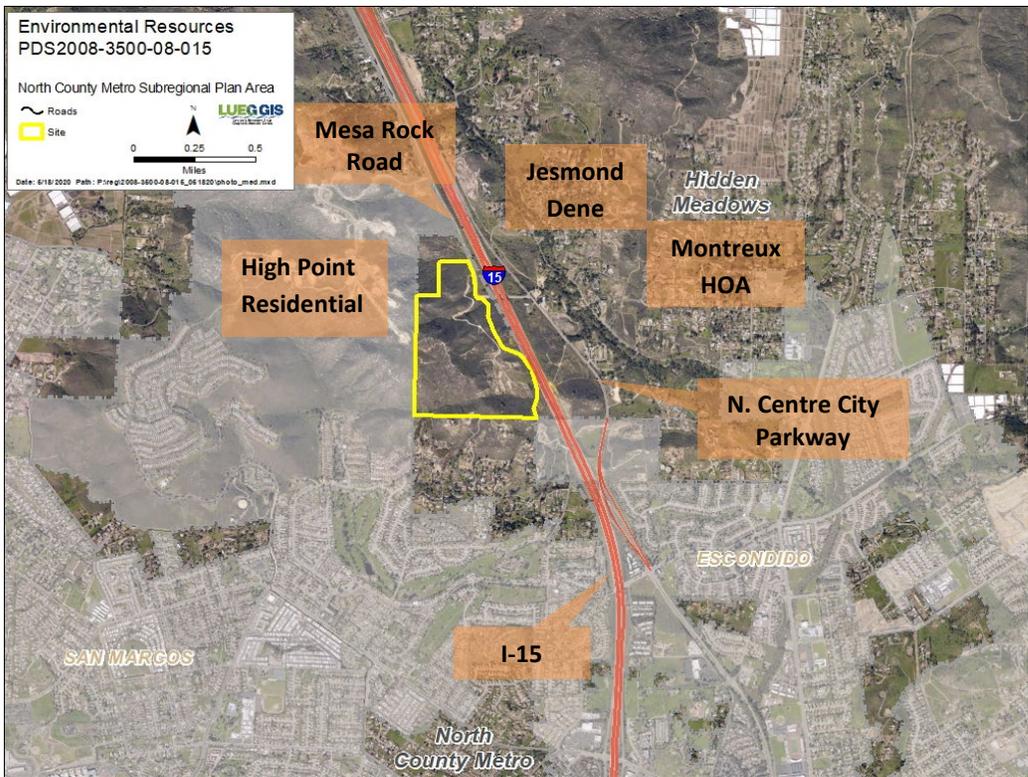


Figure 2: Surrounding Uses

Access to the proposed recycling operations would be provided by an improved private road easement connecting to Mesa Rock Road, approximately 400 feet north of where Mesa Rock Road curves east and intersects with Centre City Parkway. The private road easement would be improved and predominately follow an existing dirt road. Regional access is provided by the I-15 Deer Springs Road exit to Mesa Rock Road and N. Centre City Parkway.

**C. DEVELOPMENT PROPOSAL**

**1. Background**

The Project has been under review since 2008. Since 2008 the Applicant has revised the project scope several times, with lengthy periods of time between application resubmittals. In 2008, the Applicant performed unpermitted grading on the Project site, which resulted in unauthorized impacts to 12.88 acres. A Code Enforcement Case was opened, and mitigation will be required as part of this Project due to the unauthorized impacts. If the Project is approved, the mitigation will be included as a condition of approval. However, if the Project is denied, the mitigation will be required to resolve the Code Enforcement Case through a future discretionary action.

The Applicant originally submitted a Site Plan (STP) application for a wholesale nursery. At the time the County of San Diego was updating the General Plan, which establishes a blueprint for future land development in unincorporated County. In 2011, the County of San Diego General Plan Update (GPU) was adopted in conjunction with the certification of the GPU Environmental Impact Report (EIR). The GPU EIR comprehensively evaluated environmental impacts that would result from GPU implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts. As part of the GPU, three parcels included in the Project (APNs 187-100-31, -35, and -37) were rezoned. APNs 187-100-31 and -35 were rezoned from Limited Agriculture (A70) to General Impact Industrial (M54) and APN 187-100-37 was rezoned from Rural Residential (RR) to M54.

In 2012, the Applicant revised their project proposal from a wholesale nursery to their current proposal of a recycling facility. The County anticipated preparation of an EIR for the Project due to potentially significant impacts to aesthetics, air quality, biological resources, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, and noise. On September 11, 2014, the County issued a Notice of Preparation (NOP) of an EIR and held a NOP Scoping meeting on September 24, 2014. However, after review of the technical studies, it was determined the Project could qualify for a streamlined environmental review pursuant to CEQA Guidelines §15183, because the Project is consistent with the General Plan and zoning. The technical studies showed that the Project would not result in any significant impacts not previously addressed in the 2011 GPU EIR.

**2. Project Description**

The Project is a recycling facility that would engage in three forms of recycling: 1) tree waste chipping and grinding; 2) recycling of wood and construction debris (“C&D wood”); and 3) recycling of concrete, asphalt, and inert material from demolition projects (“CDI debris”). Only pre-sorted, non-

contaminated tree trimmings and wood and construction debris would be accepted for processing. There would be no composting or acceptance of solid waste.

A STP is required for the “B” Special Area Designator. A Habitat Loss Permit will be required for impacts to Diegan coastal sage scrub habitat in conformance with the Natural Communities Conservation Planning Act. The project also includes a Boundary Adjustment between APNs 187-100-35 and 187-100-37 to buffer residential properties to the south. Combined, the Project site consists of six contiguous parcels totaling 139.5 gross acres (135.6 net acres). However, the Project would be constructed on the adjusted acreage (18 acres) of parcel 187-100-37 in the southeast portion of the site (Figure 3).

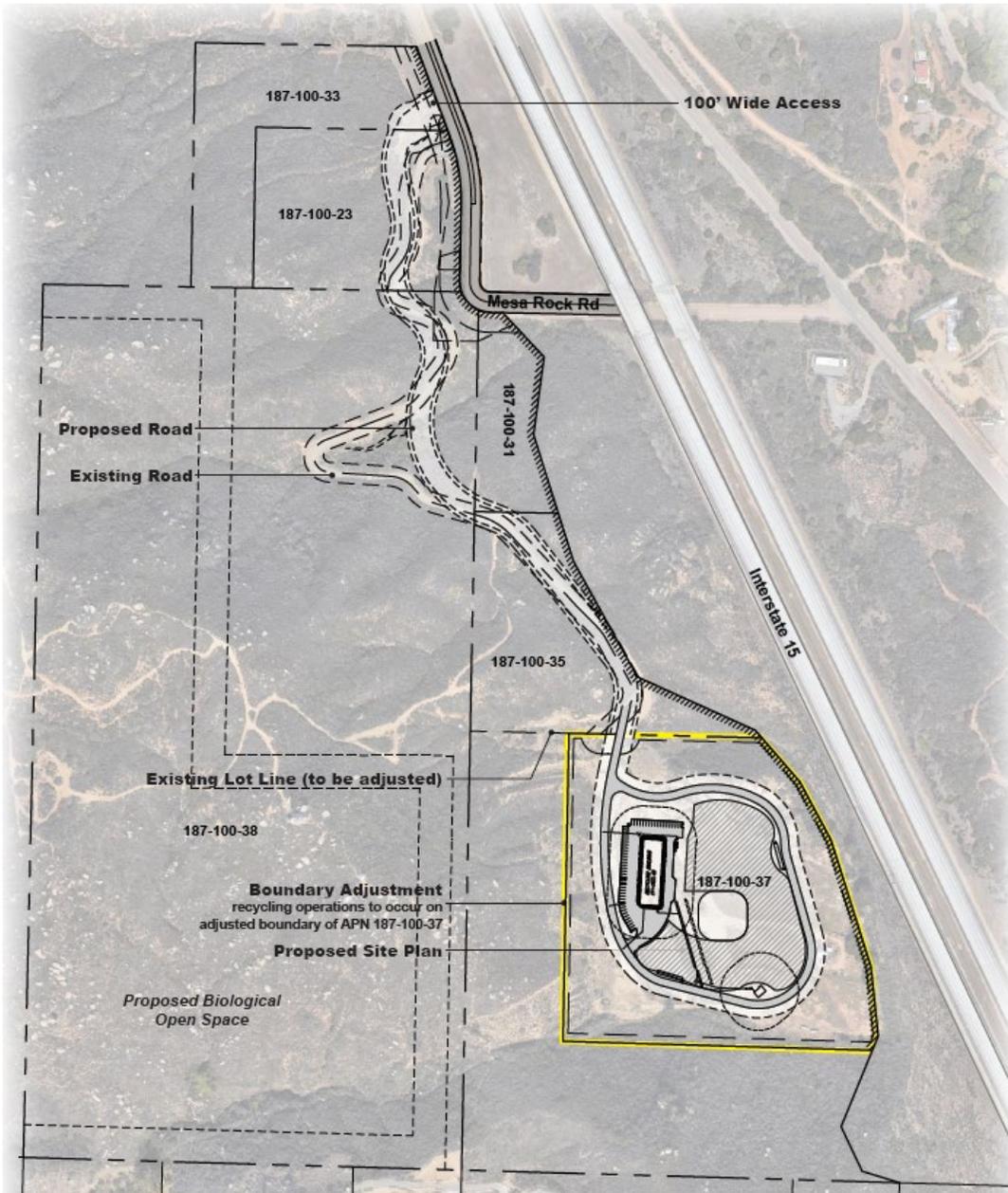
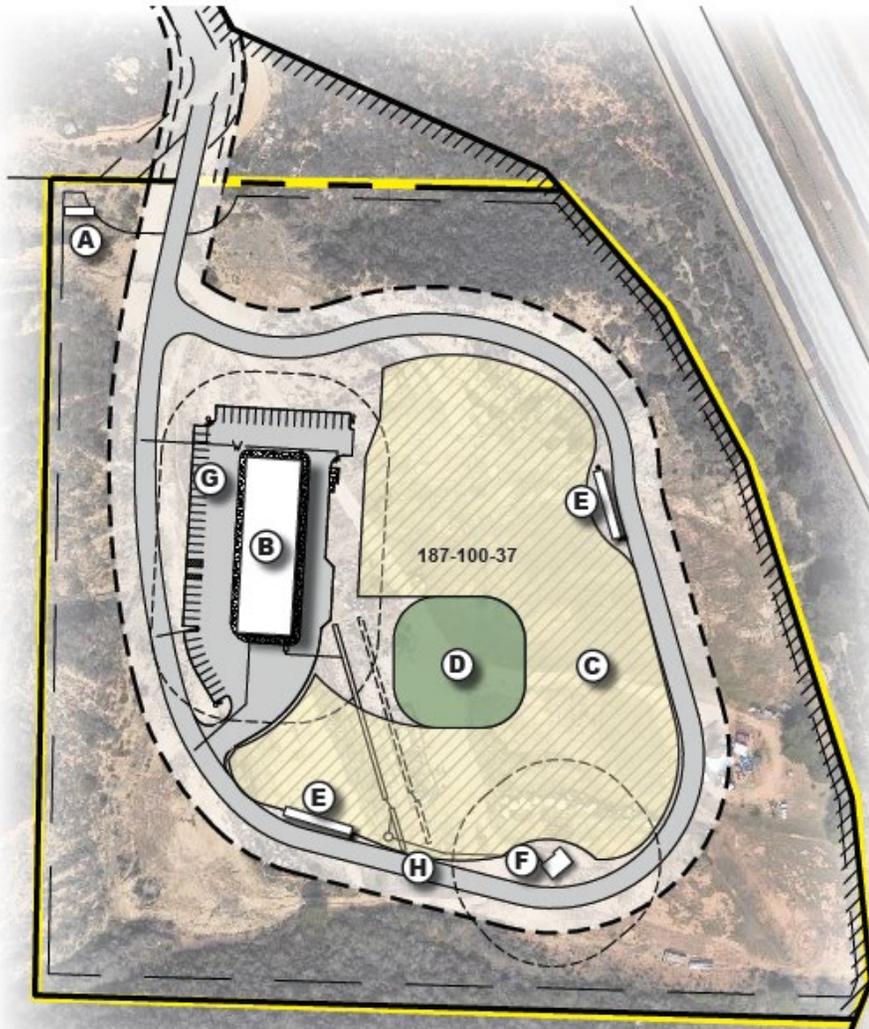


Figure 3: Overall Plot Plan

Project Components

As proposed, the Project would include construction of a 12,000-square foot steel recycling processing building with associated parking lot, 100,000-gallon water tank, a security trailer, truck scales, and up to twenty (60 feet by 60 feet by 18 feet high) adjustable storage containers. The steel recycling building will be 200 feet in length by 60 feet in width with a maximum height of 37.5 feet. The building includes four overhead doors on each side, each 24 feet in width and 26 feet in height. An additional overhead door of the same dimensions is located on the south end of the building that provides access to the wash facility. The steel building will be tan in color with brown trim.



Key Notes

- |                           |                      |
|---------------------------|----------------------|
| (A) Water Tank            | (E) Truck Scale      |
| (B) Recycling Building    | (F) Security Trailer |
| (C) Material Storage Area | (G) Parking          |
| (D) Processing Area       | (H) Proposed Road    |



Figure 4: Plot Plan

## Operations

The Applicant proposes to operate the facility six days a week, Monday through Saturday, from 5:00 AM to 7:00 PM. The Project is generally classified as a solid waste facility that will require permits from the County's Department of Environmental Health, Solid Waste Local Enforcement Agency (LEA). LEA is certified by the State to enforce solid waste laws and regulations. Project components that require solid waste permits include: (1) Medium Volume Construction Demolition and Inert Debris (CDI) Facility and (2) Chipping and Grinding Operations Facility.

A Medium Volume CDI Facility can only take in material from a construction site, demolition site, or a construction material manufacturing businesses (that is not hazardous, if it is 100 percent recycled). This type of facility cannot accept other types of solid waste, such as general residential waste, industrial waste, or office recyclables. This category of facility is limited to receiving less than 125 tons of material per day. A Medium CDI Facility is subject to monthly, unannounced inspections by the LEA. When conducting the monthly inspections, LEA looks at a number of operational characteristics, such as firefighting equipment, lighting, traffic control, and dust control. In addition, recordkeeping requirements include the documentation of incoming weights and volumes of incoming and outgoing salvage material and a daily log of special occurrences, such as receipt of prohibited wastes, accidents, or fires.

The Project also proposes Chipping and Grinding Operations. This type of operation does not produce compost but mechanically reduces the size or otherwise engages in the handling of green material. Green material includes, but is not limited to, tree and yard trimmings, untreated wood wastes, natural fiber products, and construction and demolition wood waste. The LEA will also inspect this operation and will require the preparation and implementation of an Odor Impact Minimization Plan, random checks of waste loads, and recordkeeping requirements.

In addition to the requirements that will be enforced by the LEA through permit conditions, the Project site plan is subject to conditions of approval that are established through the Zoning Ordinance and the California Environmental Quality Act (CEQA).

## Grading

The Project will require approximately 168,000 cubic yards of onsite grading and will include the import of 72,306 cubic yards of material. If the STP and Boundary Adjustment are approved, a grading permit will be required as a condition of project approval. An existing unpermitted security trailer, patio cover, septic system, and concrete pad will be removed during the site development and construction phase. If the Project is denied, the unpermitted structures will be removed as a requirement to resolve the Code Enforcement Case.

Grading is required to improve the private access road from Mesa Rock Road to the Project parcel (APN 187-100-037), and grade pads for the proposed recycling operation. The access road begins at an elevation of 961 feet above mean sea level (amsl) at Mesa Rock Road and climbs to the south to an elevation of over 1,095 feet amsl before dropping back down to an elevation of 1,032 feet amsl at the driveway to the 12,000 square foot recycling building on the Project facilities parcel. Grading and improvements for the access road will include two crib walls in two separate locations. One crib wall will be approximately 110 feet in length and the other will be approximately 180 feet in length, each having a maximum height of 10 feet. The first crib wall will have a fill slope ranging in height from 22 feet to 35 feet above it, and the second crib wall will have a fill slope ranging in height from

20 to 33 feet above it. Additional grading is required for the construction of the recycling operation on APN 187-100-37.

**Subject Property and Surrounding Land Uses**

The Project site is bordered to the east by an undeveloped parcel owned by Caltrans (zoned Limited Agriculture and Rural Residential), to the south by single-family residences and to the west by undeveloped single-family residences. The site is comprised of six individual lots totaling 139.5 gross acres (135.6 net acres).

The General Plan Regional Category for the site is Semi-Rural and the General Plan Land Use Designations are High Impact Industrial (I-3) and Semi-Rural Residential (SR-4), which will not be changed with the Project. The zoning designations, General Impact Industrial (M54), Rural Residential (RR) and Limited Agriculture (A-70) will also not be changed with the Project. Surrounding land uses include undeveloped parcels and rural residential uses, as well as commercial uses within the vicinity. Please refer to Attachment A – Planning Documentation, for maps of surrounding land uses and zoning designations.

*Table C-1: Surrounding Zoning and Land Uses*

Location	General Plan	Zoning	Adjacent Streets	Description
North	Semi-Rural Residential (SR-4)	RR/A70	Mesa Rock Road	Vacant
East	Public/Semi-Public Facilities	RR/A70/S94	I-15	Vacant, Caltrans Site
South	Semi-Rural Residential (SR-1)	RR	N/A	Single-Family Residential
West	City of Escondido	N/A	Woodland Heights Glen	Undeveloped Single-Family Residential

**D. ANALYSIS AND DISCUSSION**

The Project has been reviewed for compliance with CEQA, and a 15183 Checklist was prepared. A discussion of the Project’s consistency with CEQA Guidelines §15183 is described on the following pages. Concerns raised by the public are discussed below.

**1. Key Requirements for Requested Actions**

The Zoning Administrator shall determine whether the following findings can be made.

- a. The project is consistent with the development density established by existing zoning, community plan, or general plan policies for which the GPU EIR was certified.
- b. There are no project specific effects which are peculiar to the project or its site.

- c. There are no project specific impacts which the GPU EIR failed to analyze as significant effects.
- d. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.
- e. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

## 2. Project Analysis

### a. Aesthetics

The public raised concerns that the Project will result in significant or “peculiar” visual impacts. Comments included the concern that the Project will have significant lighting impacts on local residents, including those across I-15 in the Montreux residential development. In addition, comments expressed concern there would be impacts to existing rock formations, specifically the rock formation commonly known as “Bear Rock”.

The City of Escondido commented that the 39-lot High Point residential development is located just west of the Project site and “provides many direct sight opportunities into the proposed industrial project site.” The City of Escondido stated that such views from the High Point development would be adversely affected by the Project.

#### Analysis:

The Project site is surrounded on the north, west, and south by steep slopes between 100 to 500 feet above the proposed site pad elevation. The site is approximately 80 feet above the elevation of I-15 to the east. Intervening topography would limit the views of properties to the north, west, and south of the Project site. However, the property is within the viewshed of the North County Metro I-15 Design Corridor. Motorists would be afforded temporary views of the Project site while traveling along southbound I-15. The recycling facility will be located at an elevation ranging from 1,022 to 1,031 feet above mean sea level (amsl). This 80 to 90-foot elevation difference is comprised of a 30 to 70-foot slope along the freeway to the Project parcel, then two crib walls on the Project parcel each with a maximum height of 10 feet, followed by an additional 15 to 20 feet of fill slope, 20-foot wide bench, and 10 more feet of fill slope.

Grading for the access road will occur mainly along the route of an existing dirt road; and grading for the recycling facility will occur primarily on a previously disturbed area used by Caltrans as a borrow pit decades ago. Grading on previously disturbed areas will minimize impact to scenic attributes of the Project site and proposed landscaping will screen proposed fill slopes, retaining walls, and the recycling processing area and facilities. The Project’s light and glare impacts will be minimal and will be adequately controlled by compliance with the County’s Light Pollution Code and Zoning Ordinance. The Project will be located downslope from Bear Rock and will not impact or adversely affect views of Bear Rock.

The County’s 2011 GPU designed the site as Heavy Industrial (I-3) and zoned the site General Impact Industrial (M54). The GPU considered the visual impacts of placing industrial uses adjacent to a property identified in the Escondido General Plan as rural residential. The Project

will not result in significant view impacts on the High Point development located to the west of the Project site within the City of Escondido.

The Project would not have significant visual impacts because views are transitory from the I-15 freeway and the Project is located above the roadway grade; no physical changes to I-15 are proposed; the Project is set back from I-15 and largely blocked from view by existing topography and surrounding vegetation; and design measures will incorporate existing topography, existing vegetation, and landscaping with native plants to effectively screen the Project.

## **b. Air Quality/Greenhouse Gas Emissions**

The public raised concerns that the Project will result in significant or “peculiar” air quality and greenhouse gas (GHG) impacts. Comments also expressed concern the Project would impact the health of surrounding residents, both during construction and operations. In addition, the public has raised concerns that the recycling facility will release odors.

### Analysis:

The June 2019 Air Quality and Greenhouse Gas Assessment, prepared by Dudek, analyzed potential air quality and GHG impacts from construction and operation of the Project. Air emissions modeling showed that the estimated maximum daily emissions resulting from the operation of the Project would not exceed the County’s threshold for each of the air pollutants. If the STP is approved, project design features such as a Dust Management Plan, Odor Impact Minimization Plan, and Best Available Control Technology will be incorporated as conditions of project approval. Air quality impacts during project operation would be less than significant.

With respect to evaluating exposure to sensitive receptors, the closest receptor to the Project is a residence 620 feet to the south. No toxic air contaminants are expected to impact the closest receptor due to the steep terrain between the Project and the closest receptor and the prevailing wind direction, which is from the south southwest and will blow from the Project, away from the closest sensitive receptor, toward I-15. As the wind changes direction, toxic air contaminants are expected to dissipate with distance and intervening topography. The Project would be required to implement an Odor Impacts Minimization Plan and numerous project design features, which will make the odor impacts less than significant.

The Project would not have a significant or “peculiar” air quality impact because the Project is consistent with the County of San Diego’s General Plan land use designation and land use designations under local general plans are accounted for in local air quality plans, State Implementation Plan, and Regional Air Quality Strategy.

## **c. Biological Resources**

The public raised concerns that the Project will result in significant or “peculiar” biological impacts. The County received comments that the proposed mitigation measures for the Project’s biology impacts are not specific enough or included in the conditions of approval. One commenter requested additional mitigation for the Project’s biological impacts on portions of the Project site that had been illegally graded in the past.

## Analysis:

Biological resources on the Project site were evaluated in a Biological Assessment Report dated March 10, 2013 and prepared by BLUE Consulting Group. Additionally, a report entitled Analysis of California Gnatcatcher Movement through the North County Environmental Resources (NCER) Recycling Facility Project Site Memorandum dated December 8, 2017 was prepared by Dudek. Finally, a memorandum entitled North County Environmental Resources-Vegetation Mapping and Impacts Update Memorandum dated September 4, 2019 and prepared by Dudek was submitted to the County to verify the current site conditions and biological impacts resulting from the Project.

The Project study area contains Diegan coastal sage scrub, flat-topped buckwheat, mafic southern mixed chaparral, coast live oak woodland, southern coast live oak riparian forest and disturbed habitat. One sensitive plant species and one sensitive wildlife species were detected during field surveys: summer holly (*Comarostaphylis diversifolia* ssp. *diversifolia*) and red-tailed hawk (*Buteo jamaicensis*). Protocol California gnatcatcher surveys were conducted in October and November 2017 and no gnatcatchers were observed.

The Project resulted in unauthorized impacts to 12.88 acres as a result of unpermitted grading performed in 2008. If the Project is approved, an additional 6.23 acres would be associated with implementation of the Project. Unauthorized impacts to Diegan coastal sage scrub will be mitigated offsite at a 3:1 ratio and unauthorized impacts to mafic southern mixed chaparral will be mitigated at a 4:1 ratio through the preservation of onsite habitat within a biological open space easement. Proposed impacts to Diegan coastal sage scrub will be mitigated offsite at a 2:1 ratio, proposed impacts to mafic southern mixed chaparral will be mitigated at a 3:1 ratio through the preservation of onsite habitat within a biological open space easement and proposed impacts to coast live oak woodland and southern coast live oak riparian forest will be will be mitigated offsite at a 3:1 ratio. The Project will avoid impacts to the sensitive plant species and potential impacts to sensitive wildlife species will be mitigated through habitat-based mitigation. The Project will require a Habitat Loss Permit (HLP) for impacts to Diegan coastal sage scrub.

The Project would not have a significant or “peculiar” biological resources impact because the Project’s impacts are consistent with those considered in the GPU EIR and will be mitigated through ordinance compliance and through implementation of the following mitigation measures: purchase of offsite mitigation; dedication of biological open space and a limited building zone easement; the installation of open space signage and fencing; and biological monitoring and breeding season avoidance to prevent brushing, clearing, and/or grading between February 15 and August 31. If the Project is approved, the mitigation measures will be included as conditions of approval.

### **d. Hazards and Hazardous Materials**

The public raised concerns that the Project will result in significant or “peculiar” hazards and hazardous materials impacts. The County received comments expressing concern that the Project could result in the handling and discharge of hazardous materials, including asbestos.

Analysis:

The Project would not have a significant or “peculiar” hazards or hazardous materials impacts because the Project will not accept, handle, process, dispose of or produce asbestos or any other hazardous material or hazardous waste. If the STP is approved, the Project will implement a Hazardous Materials Program and Hazardous Load Check Program as a condition of Project approval to ensure no hazardous materials are processed at the facility. The Project will also be subject to regulatory oversight by the San Diego County Department of Environmental Health, Hazardous Materials Division.

**e. Hydrology/Water Quality**

The public raised concerns that the Project will result in significant or “peculiar” hydrology impacts. The County received comments questioning whether the Project would result in impacts to hydrology and stormwater runoff; result in significant deposition of silt into local waterway; and questioning clarification how the Project’s water demands would be met.

Analysis:

The County required the Applicant to conduct a Drainage Study and Stormwater Quality Management Plan (SWQMP). The studies demonstrated that the Project could achieve compliance with the County’s current Municipal (MS-4) stormwater permit and Watershed Protection Ordinance (WPO). As a result, the Project is not expected to cause significant hydrological or stormwater impacts. Further, the Project will control discharge of silt/sediment to the extent required under the County’s MS-4 permit. Specifically, the SWQMP requires that the Applicant implement site design measures, source control Best Management Practices (BMPs), and/or structural BMPs (including installation of bio-retention basins) to reduce potential pollutants, including sediment, from being discharged to local drainages and waterways.

The Project would receive its water from the Vallecitos Water District, which has provided the County with a Service Availability Letter, indicating that it has sufficient water to supply the Project. Initially, the Project intended to supply a portion of its water needs through on-site groundwater pumping; however, the Applicant has since decided to secure all water from Vallecitos Water District.

**f. Land Use**

The public raised concerns that the Project will result in significant or “peculiar” impacts because it proposes an industrial use adjacent to residential land uses. Comments further stated that the Project site is an inappropriate location for a recycling facility. Additional comments questioned whether the Project is consistent with the land use and zoning designations that apply to the site. The City of Escondido commented that the Project site is within its sphere of influence and is designated as rural residential in the Escondido General Plan.

Analysis:

The Project is subject to the County’s General Plan, is located within the Semi-Rural Regional Category and contains lands within the High Impact Industrial (I-3) Land Use Designation. The Project is also subject to the policies of the North County Metropolitan Subregional Plan. The property is zoned General Impact Industrial (M54) which permits light and heavy recycling processing facilities pursuant to the Zoning Ordinance Section 6975. The Project is consistent

with the General Plan, the North County Metropolitan Subregional Plan, and the I-15 Design Review Guidelines. Although the Project site is within the City of Escondido's sphere of influence, the Project is not subject to the Escondido General Plan, but rather the County's General Plan and Zoning Ordinance. The subject property is in compliance with the land use and zoning designations that are applicable to the site.

The Project would not have a significant land use impact because the Project is in compliance with the land use and zoning designations that are applicable to the site. In addition, the Project would not conflict with any land use plan, policy, or regulation.

## **g. Noise**

The public raised concerns that the Project will result in significant or "peculiar" noise impacts. The County received several comments stating that the Project would generate significant amounts of noise and violate the County Noise Ordinance. Additional comments stated local atmospheric and meteorological conditions – such as wind, temperature, and humidity – could amplify noise levels. Other comments stated that the acoustical analysis should have assumed that multiple machines, such as wheeled loader, dump truck, tab grinder, trammel screen, and crusher, would be operating simultaneously. Numerous comments asserted that the Project, by starting its daily operations at 5:00 AM, would violate the County Noise Policy N-5.2 and blasting associated with construction of the Project would disrupt residents.

### Analysis:

The noise impacts associated with the construction and operation of the Project were analyzed in the Noise Assessment Report prepared by Ldn Consulting, Inc. and Supplementary Technical Analysis prepared by Dudek. The Supplementary Noise Technical Analysis, dated May 2019, assessed worst-case conditions by modeling the noise generated by the two pieces of equipment with the highest continual noise levels operating simultaneously. Based on this modeling, the Noise Technical Analysis determined that the Project would not result in any significant noise impacts. In addition, the Noise Technical Analysis found that the Project would have no significant groundborne noise or vibration impacts during either construction or operation since blasting would be prohibited within 400 feet of residences. If the Director of Planning & Development Services makes the findings to approve the Project, PDS Staff will recommend the following condition be added:

- Monitor compliance of the equipment used during any one-hour period to ensure only two pieces of equipment will operate at any given time.

The Project would not have a significant noise impact with the incorporation of conditions of approval due to the low number of trucks entering and exiting the Project site per day; operational constraint of the recycling facility; and ridgelines and other topographical features located between the facility's equipment and residential uses.

## **h. Transportation and Traffic**

The public raised concerns that the Project will result in significant or "peculiar" transportation impacts. The County received comments expressing concern over traffic impacts of the Project and concern over an increase of truck traffic.

## Analysis:

A Preliminary Traffic Assessment was prepared by RBF, which analyzed traffic volumes, roadway segments, and peak hour intersection operations. The Project, including anticipated truck traffic, would generate 110 passenger car equivalent (PCE) average daily trips (ADTs). Using SANDAG's 2035 traffic volumes, all intersections and road segments would continue to operate at level of service (LOS) D or better with the Project. The additional 110 PCE ADTs from the Project do not exceed the 2,400 ADT (or 200 peak hour trips) required for study under the region's Congestion Management Program as developed by San Diego Association of Governments (SANDAG). The Project would add 29 trips during the AM peak and 32 trips during the PM peak.

If the Director of Planning & Development Services makes the findings to approve the Project, PDS Staff will recommend the following condition be added:

- Limit the outbound truck shipments of material to no more than an average of two per day as required by the County Zoning Ordinance Section 6975(a)(4) and require detailed logs to verify compliance.

The Project would not have a significant transportation impact because the trips generated by the Project would be below the County's minimum threshold and the Project will be subject to the payment of Transportation Impact Fees addressing cumulative impacts that may occur in the vicinity of the Project.

## **E. PUBLIC INPUT**

Throughout the processing of the Project, there has been significant interest and comments by the community, City of Escondido, members of the public and other stakeholders. During the public disclosure period, from September 12, 2019 to October 14, 2019, over 500 people commented expressing their concern and opposition to the Project. In addition, while not a requirement of CEQA Guidelines §15183, PDS staff hosted a community meeting in San Marcos on September 24, 2019 to hear input and provide additional opportunities for the public to engage. Please see Attachment D for these comments and PDS Staff response to comments. PDS uploaded all public comments and the PDS Staff responses to issue areas on the County's website for review.

## **F. COMMUNITY PLANNING OR SPONSOR GROUP**

The Project is located within the Twin Oaks Community Sponsor Group (CSG) area. A notice was sent to the Twin Oaks CSG to provide opportunity for members of the public to comment on the Project. The Project was heard at several Twin Oaks CSG meetings since the application was submitted in 2008. At the October 16, 2019 meeting, the Twin Oaks CSG recommended against a determination that the Project qualify for an exemption from further environmental review pursuant to CEQA Guidelines §15183, and that an EIR be completed for the Project by a vote of 4-0-0-2 (4-Yes, 0-No, 0-Abstain, 2-Absent). Furthermore, the Twin Oaks CSG states that the Project will have negative impacts on the neighboring community and opposes approval of the Project.

While the Project is not located within the Hidden Meadows CSG area, the Hidden Meadows CSG heard the Project at several meetings due to substantial community interest. At the October 24, 2019 meeting,

by a vote of 5-0-0-4 (5-Yes, 0-No, 0-Abstain, 4-Vacant/Absent), the Hidden Meadows CSG voted to recommend denial of the project and requested to reevaluate the property if an Environmental Impact Report was prepared. The Hidden Meadows CSG heard the project again on June 4, 2020 and June 11, 2020. At the June 11, 2020 meeting, the Hidden Meadows CSG recommended against a determination that the Project qualify for an exemption from further environmental review pursuant to CEQA Guidelines §15183 because the project has peculiar effects by a vote of 5-0-0-4 (5-Yes, 0-No, 0-Abstain, 4-Vacant/Absent).

The Twin Oaks and Hidden Meadows CSG meeting minutes are included in Attachment D, Public Documentation.

**G. STAFF RECOMMENDATIONS**

Staff recommends that the Zoning Administrator adopt the Environmental Findings included in Attachment B, which includes a finding that the Project is exempt from further environmental review pursuant to §15183 of CEQA.

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**Report Prepared By:**

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**ATTACHMENTS:**

- Attachment A – Planning Documentation
- Attachment B – Environmental Documentation
- Attachment C – Site Plan and Preliminary Grading Plan
- Attachment D – Public Documentation